

ALL-STATE LEGAL®

DEFENDANT'S
EXHIBIT

102 C

1. Admit that you did not inform Richardson of your disability prior to starting your employment with Defendants.

Response: Admit that I did not inform Richardson of my disability *prior* to starting employment, but I still timely informed him.

2. Admit that you were offered a different employment with defendants to accommodate your disability as alleged in your complaint.

Response: Deny

3. Admit that you refused to accept a different employment position with Defendants.

Response: Deny

4. Admit that during your employment with Defendants you were rude and verbally abrasive to customers that called Defendants' office.

Response: Deny that I was "rude and abrasive," but admit to the possibility of being tactless.

5. Admit that you were offered an employment with Defendants in a position that did not require customer contact and that you refused to accept such a position.

Response: Deny

6. Admit that you read and signed the standard company policy pamphlet.

Response: Admit that I read and signed the policy pamphlet, but do not agree, blindly, to any specific terms.

7. Admit that Defendants' business a service-oriented business with a reputation for quick, quality and friendly service.

Response: The Plaintiff lacks sufficient information to either admit or deny. The Plaintiff has no knowledge of the company's "reputation" throughout Branson, MO. The Plaintiff cannot reasonably obtain this information with the resources currently at his disposal. In any event, the Plaintiff denies that such a fact is even relevant to this case.

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